

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. 203

**DECLARATION OF JAMES L. BROMLEY IN SUPPORT OF DEBTORS' OBJECTION
TO MOTION FOR ENTRY OF AN ORDER SHORTENING THE NOTICE AND
OBJECTION PERIODS WITH RESPECT TO EMERGENCY MOTION (I) FOR
RELIEF FROM AUTOMATIC STAY AND (II) TO COMPEL TURNOVER OF
ELECTRONIC RECORDS UNDER SECTIONS 542, 1519(A)(3), 1521(A)(7) AND 1522
OF THE BANKRUPTCY CODE**

James L. Bromley hereby declares as follows:

1. I am a member in good standing of the Bar of the State of New York and have been admitted *pro hac vice* to practice before this Court. I am a partner of Sullivan & Cromwell LLP and am one of the attorneys representing FTX Trading Ltd. and the other Debtors in the above-captioned action. I submit this declaration in support of Debtors' *Objection to Motion for Entry of an Order Shortening the Notice and Objection Periods with Respect to Emergency Motion (I) For Relief From Automatic Stay and (II) To Compel Turnover of Electronic Records Under Sections 542, 1519(A)(3), 1521(A)(7) and 1522 of the Bankruptcy Code* ("Objection"), filed concurrently herewith.

¹ The last four digits of FTX Trading Ltd.'s and Alameda Research Ltd.'s tax identification numbers are 3288 and 1725 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

2. Attached hereto as **Exhibit A** is a true and correct copy of an email from Sam Bankman-Fried to Ryan Pinder KC, the Attorney General of The Bahamas, regarding “FTX/Binance,” dated November 9, 2022.

3. Attached hereto as **Exhibit B** is a true and correct copy of a media release from the Securities Commission of The Bahamas entitled “Securities Commission Statement on Transfer Motion In FTX Digital Markets Chapter 15 Proceedings,” dated November 23, 2022.

4. Attached hereto as **Exhibit C** is a true and correct copy of a letter from James L. Bromley and Brian D. Glueckstein to the Securities Commission of The Bahamas and Brian Simms KC, dated November 13, 2022.

5. Attached hereto as **Exhibit D** is a true and correct copy of letter from John J. Ray III to the Honorable Philip Davis KC, the Prime Minister of The Bahamas, and Mr. Pinder, dated November 27, 2022.

6. Attached hereto as **Exhibit E** is a true and correct copy of a press release issued by the Office of the Attorney General of The Bahamas entitled “National Address on Behalf of The Government of The Bahamas on the Developments of FTX in The Bahamas,” dated November 27, 2022.

7. Attached hereto as **Exhibit F** is a true and correct copy of a letter from Mr. Ray to Messrs. Davis and Pinder, dated December 1, 2022.

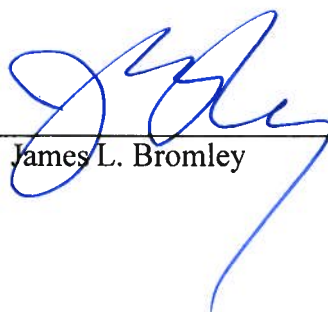
8. Attached hereto as **Exhibit G** is a true and correct copy of a letter from Robert K. Adams KC, counsel for Securities Commission of The Bahamas, to Jason Maynard, Bahamian counsel for Debtors, dated December 7, 2022.

9. Attached hereto as **Exhibit H** is a true and correct copy a letter from Brian Pfeiffer, counsel to the JPLs, to Mr. Bromley, Andrew G. Dietderich, and Mr. Glueckstein, dated December 7, 2022.

10. Attached hereto as **Exhibit I** is a true and correct copy of an email from Mr. Pfeiffer to Mr. Bromley, *et al.*, regarding “FTX,” dated December 9, 2022.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed in Washington, D.C. on December 12, 2022



James L. Bromley